

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Tri-State Paper, Inc.,

Debtor.

Case No. 23-13237-pmm

Chapter 11

Tri-State Paper, Inc.,

Plaintiff,

v.

Michael L. Seccia,  
Nancy Lynn Seccia,

Defendants.

Adversary No. 24-00001-pmm

**Plaintiff's Request for Entry of Default Against  
Defendants Michael L. Seccia and Nancy Lynn Seccia**

To the Clerk of Court:

Defendants Michael L. Seccia and Nancy Lynn Seccia have failed to appear, plead, or otherwise defend against Plaintiff Tri-State Paper, Inc.'s complaint for judgment for affirmative relief within the time allowed and are therefore in default as evidenced by the record and the declaration attached as Exhibit A.

Consequently, you must enter default against Defendants Michael L. Seccia and Nancy Lynn Seccia pursuant to Fed. R. Bankr. P. 7055 and Fed. R. Civ. P. 55(a).

Date: February 28, 2024

CIBIK LAW, P.C.  
*Counsel for Plaintiff*

By: /s/ Michael I. Assad

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**Exhibit A**  
**Declaration in Support of Plaintiff's Request for Entry of Default**

I, Michael I. Assad, declare as follows:

1. I am the attorney for Plaintiff Tri-State Paper, Inc. in the above-entitled action and I am familiar with the file, records, and pleadings in this matter.
2. The summons and complaint were filed on January 2, 2024.
3. The Defendants were served with a copy of the summons and complaint on January 5, 2024, as reflected on the docket sheet by the proof of service filed on January 5, 2024.
4. An answer to the complaint was due on February 2, 2024.
5. The Defendants have failed to appear, plead, or otherwise defend within the time allowed and, therefore, are now in default.
6. The Plaintiff requests that the clerk of court enter default against the Defendants.
7. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Date: February 28, 2024

/s/ Michael I. Assad  
Michael I. Assad (#330937)